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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	
	§	CASE NO. 21-32075-13 SGJ
JAMISHA MARIE DEWBERRY	§	
	§	CHAPTER 13
Debtor(s).	§	
	§	
ALLMAND LAW FIRM, PLLC	§	Hearing Date: 06/23/22
Movant.	§	Hearing Time: 1:30 P.M.
V.	§	
	§	
JAMISHA MARIE DEWBERRY	§	Preliminary Hearing on Motion
	§	for Relief from Automatic Stay:
Debtor-Respondent.	§	

**DEBTOR'S ANSWER AND OBJECTION TO
MOTION FOR RELIEF FROM AUTOMATIC STAY
FILED BY ALLMAND LAW FIRM, PLLC**

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COMES NOW JAMISHA MARIE DEWBERRY ("Debtor" whether singular or plural) and requests of the Court that a hearing be scheduled on the subject matter and files this Debtor's Answer and Objection to Motion for Relief from Automatic Stay Filed by Allmand Law Firm, PLLC ("Movant"), and in support hereof would respectfully show the Court as follows:

SPECIFIC ADMISSIONS

1. Debtor admits the allegations contained in paragraph(s) 1, 2, 3, and 4 of Movant's Motion.

SPECIFIC DENIALS

2. Debtor denies the allegations contained in paragraph(s) 5, 6 and 7 of Movant's Motion and demands strict proof thereof.

EFFECT OF QUALIFIED DENIAL OR LACK OF ADMISSION

3. Debtor neither admits or denies the allegations contained in paragraph(s) 7 of Movant's Motion having insufficient information to do so, and therefore, denies same and demands strict proof thereof.

ELEMENT OF DEBTOR'S DEFENSE

4. There exists cause justifying the denial of Movant's Motion and requested action for the following reasons:

B. The property is necessary for the effective reorganization of the Debtor because it is the Debtor's homestead.

C. Movant has been, and will be, afforded adequate protection for the following reasons:

1. Debtor would show the Court that adequate protection is being paid in payments pursuant to General Order 2021-01, the Debtor's Authorization for Adequate Protection Disbursements, and Debtor's Chapter 13 Plan.

2. Debtor would show the Court that adequate protection is being paid by paying the indebtedness through Debtor's Confirmed Chapter 13 Plan of reorganization.

3. Debtor would show that the subject property is adequately insured to the extent necessary, proper, and sufficient to protect Movant's interest in the collateral.

4. Debtor would show the Court that any default may be cured within a reasonable time.

RIGHT TO AMEND OR SUPPLEMENT RESERVED

5. Debtor reserves the right to amend or supplement this Answer with additional information supported by Debtor's evidence, affidavit and/or amended answer.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Debtor prays that a hearing be set in the instant matter, that Movant's Motion be denied in all respects and that the automatic stay pursuant to §362 of the United States Bankruptcy Code remain in full force and effect, and for such other and further relief to which the Debtor may show himself entitled.

Respectfully submitted,

ALLMAND LAW FIRM, PLLC

/s/ Jennifer Dartez

JENNIFER DARTEZ

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Attorney for Debtor(s)

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing Debtor's Answer and Objection to Motion for Relief from Automatic Stay was served on each party listed below, by the means stated below, on June 1, 2022:

DEBTOR:	FIRST CLASS MAIL Jamisha Marie Dewberry 10911 Woodmeadow Pkwy #1203 Dallas, TX 75228
ATTORNEY FOR MOVANT:	ELECTRONIC MAIL Brandy Alexander SBN 24108421 2502 La Branch St. Houston, Texas 77004
CHAPTER 13 TRUSTEE:	ELECTRONIC MAIL Tom Powers Office of the Standing Ch. 13 Trustee 105 Decker Ct. #1150 Irving, TX 75062

/s/ Jennifer Dartez
JENNIFER DARTEZ
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